# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§	Chapter 11
	§	
MONTCO OFFSHORE INC., et al. <sup>1</sup>	§	Case No. 17-31646 (MI)
	§	
Debtors.	§	(Jointly Administered)

## LIQUIDATING TRUSTEE'S MOTION FOR ENTRY OF AN ORDER FURTHER EXTENDING THE TERMINATION DATE OF THE LIQUIDATING TRUST

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the court, you must file your response electronically at https://ecf.txsb.uscourts.gov/ within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the court may treat the pleading as unopposed and grant the relief requested.

Drew McManigle, Liquidating Trustee (the "<u>Liquidating Trustee</u>") on behalf of the Liquidating Trust for Montco Oilfield Contractors, LLC (the "<u>Liquidating Trust</u>") files this *Motion* for Entry of an Order Further Extending the Termination Date of the Liquidating Trust (the "<u>Motion</u>") and in support thereof, respectfully states as follows:

#### I. <u>Jurisdiction</u>

1. The United States Bankruptcy Court for the Southern District of Texas Houston Division (the "Court") has jurisdiction over this Motion pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper before this Court pursuant 28 U.S.C. § 1408.

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtors' federal tax identification number, are Montco Offshore, Inc. (1448) and Montco Oilfield Contractors, LLC (9886).

#### II. Background

- 2. On March 17, 2017 (the "Petition Date"), Montco Offshore, Inc. and Montco Oilfield Contractors, LLC ("MOC," and collectively, the "Debtors") filed voluntary petitions for relief (the "Chapter 11 Cases") under chapter 11 of the Bankruptcy Code in the Court.
- 3. On January 18, 2018, the Court entered its Findings of Fact, Conclusions of Law, and Order Approving the Disclosure Statement and Confirming the Amended Plan of Reorganization of Debtor Montco Offshore, Inc. and the Amended Plan of Liquidation of Debtor Montco Oilfield Contractors, LLC under Chapter 11 of the Bankruptcy Code [Case No. 17-31646, Docket No. 784] (the "Confirmation Order"), which confirmed the Amended Plan of Reorganization of Debtor Montco Offshore, Inc. and Amended Plan of Liquidation of Debtor Montco Oilfield Contractors, LLC under Chapter 11 of the Bankruptcy Code [Case No. 17-31646, Docket No. 740] (the "Plan").<sup>2</sup>
- 4. On February 8, 2018, the effective date of the Plan occurred [See Docket No. 811] (the "Effective Date").
- 5. The Plan and Confirmation Order established the Liquidating Trust for MOC and approved the Liquidating Trust Agreement [Docket No. 776-1] (the "<u>Trust Agreement</u>"), which among other things, appointed Drew McManigle as the Liquidating Trustee. *See* Trust Agreement, § 2.1.
- 6. The Liquidating Trust was established for the primary purpose of liquidating the Liquidating Trust Assets and distributing the proceeds to holders of Allowed Claims in accordance with the specific terms of the Plan. *See* Trust Agreement, § 7.1; *see also* Plan, Art. IV.I. The Plan provides that the Liquidating Trust shall terminate upon the earlier of (a) the date on which all of

<sup>&</sup>lt;sup>2</sup> Capitalized terms not specifically defined herein are given the meaning ascribed to such terms in the Plan.

the Liquidating Trust Assets are liquidated in accordance with the Plan, the funds in the Liquidating Trust have been completely distributed in accordance with the Plan, all tax returns and any other filings or reports have been filed with the appropriate state or federal regulatory authorities and the Order closing the Chapter 11 Cases is a Final Order or (b) five (5) years from the date of creation of the Liquidating Trust, unless extended by the Court. *See* Plan, Art. IV.V.

- 7. On November 8, 2022, the Liquidating Trustee filed the *Motion for Entry of an Order Extending the Termination Date of the Liquidating Trust* [Docket No. 1128] requesting that the extension of the original date to terminate the Liquidating Trust from February 8, 2023 to February 8, 2024.
- 8. On January 4, 2023, the Court entered the *Order Extending the Termination Date* of the Liquidating Trust [Docket No. 1132], extending the termination date to February 8, 2024 (the "Termination Date").
- 9. Pursuant to the Plan, the Liquidating Trustee may seek approval from the Court to extend the Termination Date for a reasonable period in order to fulfill the purpose of the Liquidating Trust. *See* Plan, Art. IV.V. As set forth herein, the administration of the Liquidation Trust remains ongoing and cause exists to extend the Termination Date.

#### III. Requested Relief

10. By this Motion, the Liquidating Trustee seeks entry of an order, substantially in the form attached hereto, pursuant to section 105(a) of title 11 of the United States Code (the "Bankruptcy Code"), the Confirmation Order, Article IV.V of the Plan, and section 9.1 of the Trust Agreement to extend the Termination Date for a period of one (1) year, through and including February 8, 2025, subject to further extension as necessary in order to complete its designated purpose of distributing assets.

- 11. The Liquidating Trustee requests the extension of the Termination Date because additional time is necessary to (i) recover and liquidate all Liquidating Trust Assets, (ii) make appropriate distributions to the Beneficiaries in accordance with the Plan, and (iii) enable the Liquidating Trust to fulfill various tax, accounting, and administrative functions relating to the termination of the Liquidating Trust (the "Winding Up Activities").
- 12. Moreover, the Liquidating Trustee submits that an extension of the Termination Date for one (1) year does not unreasonably prolong the length of the Liquidating Trust, does not cause the declared purpose of the Liquidating Trust to be lost or abandoned, and is critical for the Liquidating Trustee to maximize recovery of the Liquidating Trust Assets for the benefit of the Beneficiaries and complete the Winding Up Activities in an efficient and orderly manner.

#### IV. Basis for Relief Requested

- 13. Section 105(a) of the Bankruptcy Code provides, in pertinent part, that "[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a).
- 14. The purpose of section 105(a) of the Bankruptcy Code is "to assure the bankruptcy court's power to take whatever action is appropriate or necessary in aid of the exercise of [its] jurisdiction." Collier On Bankruptcy, ¶ 105.01 (Richard Levin & Henry J. Sommer eds., 16th ed.) (citing Feld v. Zale Corp. (In re Zale Corp.), 62 F.3d 746, 759–60 (5th Cir. 1995)). In addition, the Plan and Confirmation Order provide that the Court retains exclusive jurisdiction over the matters and has authority to enforce and issue orders in aid of execution and consummation of the Plan as may be necessary and appropriate. See Confirmation Order, ¶ 103; see also Plan, Art. X.6. Moreover, the Plan and the Trust Agreement provide that the Termination Date may be extended. See Plan, Art. IV.V; see also Trust Agreement, § 9.1.

- 15. In this case, an order extending the Termination Date is appropriate because the Liquidating Trustee requires additional time to fully administer the assets and perform his duties as Liquidating Trustee of the Liquidating Trust. Most of the Liquidating Trustee's activities to date have been dedicated to filing claim objections and pursuing claims and other sources of recovery, which are substantially complete. In particular, the Liquidating Trustee has pursued (i) various Causes of Action, and (ii) the recovery of non-insider preference claims.
- 16. More than 270 proofs of claim (the "Claims") were filed in the Chapter 11 Cases. Since the Effective Date, the Liquidating Trustee has been reviewing the Claims to identify those that should be disallowed, reduced and allowed, or reclassified, and to resolve or file objections to certain of the Claims. The Liquidating Trustee and his professionals thoroughly reviewed the Debtors' books and records, and the claims register to determine the Claims entitled to priority status as well as those that were duplicative of the same claimants, those that were filed late, those that were amended, and those that should be reduced or disallowed. The Liquidating Trustee has resolved almost all of the Claims.
- 17. Additionally, the Liquidating Trustee sent 21 demand letters to avoid and recover numerous preferential transfers made by the Debtors to or for the benefit of certain creditors. Since sending these letters, the Liquidating Trustee filed 21 avoidance actions on March 12 and 14, 2019 and May 31, 2019 and has spent considerable time gathering relevant information such as invoices and bank statements, corresponding with creditors, evaluating the creditors' potential defenses, and negotiating settlements. The Liquidating Trustee and his professionals entered into stipulations and/or settlement agreements with all defendants to resolve these avoidance actions. In connection with these preferential and fraudulent transfers, on February 27, 2023, the Liquidating Trustee entered into the *Seventh Amended Tolling Agreement* with Aqueos Corporation ("Aqueos") in

order to toll the statute of limitations for the Liquidating Trustee to investigate and bring a Cause of Action against Aqueos (the "<u>Tolling Agreement</u>"). The Tolling Agreement expired on August 28, 2023.

- Trust is the lack of resolution of the Black Elk Litigation (as defined below). On May 18, 2017, the Debtors' filed their *Original Complaint* [Adv. No. 17-03249, Docket No. 1] against multiple defendants including Black Elk Energy Offshore Operations, LLC seeking damages of no less than \$27,000,000 based on claims for breach of contract, *quantum meruit*, misrepresentation, and declaratory judgment (the "Black Elk Litigation"). Pursuant to the Plan, all MOC Causes of Action, including, without limitation, the Black Elk Litigation, were transferred to the Liquidating Trust on the Effective Date. *See* Plan, Art. I.A(84), Art IV.M. Accordingly, the Liquidating Trustee has the authority and sole responsibility to prosecute and settle the Black Elk Litigation, which represents a major potential source of recovery for the Beneficiaries of the Liquidating Trust. *See* Plan, Art IV.S; *see also* Confirmation Order, ¶ 62; *see also* Trust Agreement, § 3.1(e), (f).
- 19. On December 5, 2018, the Liquidating Trustee filed the *Renewed and Supplemental Motion for Leave to Amend Complaint, Motion for Reconsideration, and Motion to Lift Discovery Stay* in the Black Elk Litigation [Adv. No. 17-03249, Docket No. 179] (the "Motion for Reconsideration"). To date, there have been two responses filed in opposition to the Motion for Reconsideration [*See* Adv. No. 17-03249, Docket Nos. 180 and 186] and the Liquidating Trustee filed a reply in support of the Motion for Reconsideration [*See* Adv. No. 17-03249, Docket Nos. 180 and 186] and the Liquidating Trustee

The Debtors filed an *Amended Complaint* on June 21, 2017 [See Adv. No. 17-03249, Docket No. 33] (the "Amended Complaint"). On October 3, 2017, the Court entered an order dismissing portions of the Amended Complaint [See Adv. No. 17-03249, Docket No. 147]. Thereafter, on April 2, 2018, the Liquidating Trustee filed the Second Amended Complaint [See Adv. No. 17-03249, Docket No. 158]. On October 31, 2018, the Court entered an order dismissing certain of the Debtors' claims [See Adv. No. 17-03249, Docket No. 170].

187]. The briefing on the Motion for Reconsideration was completed over four and a half years ago.

- 20. Over the last year, the Liquidating Trustee and Richard Schmidt, in his capacity as the liquidating trustee of the Black Elk Litigation Trust and the Black Elk Liquidating Trust, have been in continued negotiations to settle and dispose of, fully and completely, any and all claims, demands, and causes of actions arising out of the claims set forth in the Black Elk Litigation.
- 21. The outcome of the ongoing Black Elk Litigation will determine the amount of funds that will be available to the Liquidating Trustee for distribution to the Debtors' creditors. Under the circumstances, the Liquidating Trustee believes that an extension of the Termination Date will afford him additional time to fully administer the assets of the Liquidating Trust, and is therefore in the best interests of the estate, creditors, and all parties in interest.
- 22. The Liquidating Trustee makes the request in the instant Motion without prejudice to his rights to seek further extensions as may be necessary to the resolve the outstanding issues in this bankruptcy case.
- 23. For all of the foregoing reasons, the Liquidating Trustee submits that the Termination Date of the Liquidating Trust should be extended for one (1) year.

#### V. Notice

24. Notice of this Motion will be given to all parties that have requested or that are required to receive notice pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure and any party required to be served under Rule 9013-1(d) of the Bankruptcy Local Rules for the Southern District of Texas. The Liquidating Trustee respectfully submits that no further notice of this Motion is required.

25. No prior request for the relief sought herein has been made to this or to any other court.

#### VI. Prayer

WHEREFORE, the Liquidating Trustee respectfully requests that the Court enter an order (i) extending the Termination Date of the Liquidating Trust to February 8, 2025, and (ii) granting such other and further relief as this Court may deem just and proper.

Dated: December 15, 2023

#### PORTER HEDGES LLP

By /s/ Joshua W. Wolfshohl
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COUNSEL FOR DREW MCMANIGLE, LIQUIDATING TRUSTEE FOR THE MONTCO OILFIELD CONTRACTORS, LLC LIQUIDATING TRUST Case 17-31646 Document 1143 Filed in TXSB on 12/15/23 Page 9 of 14

**CERTIFICATE OF SERVICE** 

I certify that on December 15, 2023, I caused a copy of the foregoing document to be served

by (i) electronic transmission to all registered ECF users appearing in this case on December 15,

2023; (ii) U.S. First-Class Mail to the interested parties as indicated on the attached Service List

on December 15, 2023; and (iii) email to the interested parties as indicated on the attached Service

List on December 15, 2023

/s/ M. Shane Johnson

M. Shane Johnson

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### SERVICE LIST

MACK STEEL & SUPPLY	DIANE B PLAISANCE PO BOX 820	GALLIANO	LA	70354	First-Class Mail
WW GRAINGER INC	MWX22807057989	LAKE FOREST	IL	60045-5202	First-Class Mail
	100 GRAINGER PKWY C/O TIMOTHY THRIFFILEY ESQ	BELLE CHASSE	LA	70037	First-Class Mail
RETIF OIL & FUEL LLC	PO BOX 7125				
TRITON DIVING SERVICES, LLC	3421 N CAUSEWAY BLVD SUITE 601	METAIRIE	LA	70002	First-Class Mail
MAGNUM MUD EQUIPMENT CO., INC. NEWLIN RENTALS-REPAIRS & SUPPLIES INC	PO BOX 4258	HOUMA	LA	70361	First-Class Mail
	727 SUGARHOUSE ROAD 19219 KATY FREEWAY	PATTERSON HOUSTON	LA TX	70392 77094	First-Class Mail First-Class Mail
J CONNOR CONSULTING, INC.	SUITE 200				
TRIPLE SON WHOLESALE TIMBERS INC	CHERYL E DUET 14502 WEST MAIN ST	CUT OFF	LA	70345	First-Class Mail
GREENWING PETROLEUM, LLC	5851 SAN FELIPE ST 230B	HOUSTON	TX	77057	First-Class Mail
Dexcomm	518 Patin Road RANDY ADAMS	Carencrow CUT OFF	LA	70520 70345	First-Class Mail First-Class Mail
SEA SUPPORT VENTURES LLC	104 ABC LANE				
OFFSHORE TECHNICAL COMPLIANCE LLC	WILLIAM S. SHOFFIELD, JR, MANAGER 1598 OCHSNER BLVD SUITE 100	COVINGTON	LA	70433	First-Class Mail
AMERICAN POLLUTION CONTROL CORPORATION	DANA L ROY 401 W ADMIRAL DOYLE DR	NEW IBERIA	LA	70560	First-Class Mail
BAYOU INSPECTION SERVICES INC	DAVID M PATTERSON, SEC./TREAS.	AMELIA	LA	70380	First-Class Mail
HUGG & HALL EQUIPMENT COMPANY	PO BOX 1065 PO BOX 194110	LITTLE ROCK	AR	72219-4110	First-Class Mail
BOW 2 STERN SERVICES INC	MR SHANE THIBODEAUX	HOUMA	LA	70360	First-Class Mail
	119 CAPITAL BLVD	LAFAVETTE	L .		
UV LOGISTICS LLC	PO BOX 81008 UNITED VISION LOGISTICS	LAFAYETTE	LA	70598	First-Class Mail
ALLENDORPH SPECIALTIES, INC.	201 STANTON ST	BROUSSARD	LA	70518	First-Class Mail
NOVA TECHNICAL SERVICES LTD	JOE NOWICZEWSKI 623 BUFFINGTON ST	HOUSTON	TX	77060	First-Class Mail
COMPLETE OCCUPATIONAL HEALTH SERV , LLC	KAYLA FULLILOVE	LAROSE	LA	70373	First-Class Mail
EXPRESS OIL #0001	13554 HIGHWAY 3235 17632 WEST MAIN ST	GALLIANO	LA	70354	First-Class Mail
EAPRESS OIL #0001	D. ETHAN JEFFERY, ATTORNEY FOR HOLDER	BRAINTREE	MA	02184	First-Class Mail
CASHMAN EQUIPMENT CORP	41 BROOKS DRIVE SUITE 1005				
Theriot, Duet & Theriot, Inc.	LYNN P. PIERCE, PRESIDENT 144 North 1st Street	Golden Meadow	LA	70357	First-Class Mail
B & J Martin Inc	BEAU MARTIN 18104 W MAIN	GALLIANO	LA	70354	First-Class Mail
MACTECH, INC.	DAVID SCHREIBER, VP	RED WING	MN	55066	First-Class Mail
EXPRESS SUPPLY & STEEL LLC	4079 PEPIN AVE., UNIT 4 PO BOX 189	RACELAND	LA	70394	First-Class Mail
REDFISH RENTALS INC	5306 HWY 311	HOUMA	LA	70360	First-Class Mail
T & D TOWING LLC	DARRYL CHAUSIN, MEMBER PO BOX 3249	MORGAN CITY	LA	70381	First-Class Mail
	W.D. LESTER, MANAGER	LAFYETTE	LA	70508	First-Class Mail
KILGORE MARINE SERVICES, LLC	200 BEAULLIEU DRIVE BUILDING 8				
MARINE SYSTEMS INC	116 CAPITAL BLVD	HOUMA	LA	70360	First-Class Mail
GLOBAL DATA SYSTEMS INC	310 LASER LANE KELLY C. WURSTEISEN, TREASURER	LAFAYETTE NEW ORLEANS	LA LA	70507 70125	First-Class Mail First-Class Mail
BEERMAN PRECISION INC.	4206 HOWARD AVENUE				
GRAND ISLE SHIPYARD INC	C/O DIANE B. PLAISANCE PO BOX 820	GALLIANO	LA	70354	First-Class Mail
ALFORD SAFETY SERVICES LLC	JAROD RICHARD	HOUMA	LA	70363	First-Class Mail
	209 CLENDENNING RD PO BOX 12548	AUSTIN	TX	78711-2548	First-Class Mail
TEXAS WORKFORCE COMMISSION	OFFICE OF THE ATTORNEY GENERAL				
TENSO TOTAL STOLE SOMMODOW	BANKRUPTCY & COLLECTIONS DIVISION MC-008				
SAFETY & TRAINING CONSULTANTS, LLC	219 VENTURE BLVD	HOUMA	LA	70360	First-Class Mail
SAFETY & TRAINING CONSULTANTS, LLC	219 VENTURE BLVD	HOUMA	LA	70360	First-Class Mail
SEPARATOR SPARES AND EQUIPMENT, LLC	144 INTRACOASTAL DRIVE	HOUMA	LA LA	70363	First-Class Mail
CENTRAL DISPATCH INC.	JONI C GRAVOLET, PRESIDENT 1700 4TH STREET	HARVEY	LA	70058	First-Class Mail
Data Technology Solutions	PO BOX 880	Breaux Bridge	LA	70517-0880	First-Class Mail
VERSABAR, INC.	C/O PHILIP RUNDLE 11349 FM 529 ROAD	HOUSTON	TX	77041	First-Class Mail
DISHMAN & BENNETT SPECIALTY CO., INC.	PO BOX 287	HOUMA	LA	70360	First-Class Mail
CONNECTOR SPECIALISTS INC	PO BOX 8988	MANDEVILLE	LA	70470	First-Class Mail
DEEP SOUTH CHEMICAL, INC.	PO BOX 80657	LAFYETTE	LA	70598-0657	First-Class Mail
TOTAL RENTALS INC	2124 BAYOU BLUE RD	HOUMA	LA	70364-3909	First-Class Mail
BAYOU SUPPLY & SAFETY CO.	RANDY J CAUSIN, CEO 24 COQUILLE DRIVE	BELLE CHASSE	LA	70037	First-Class Mail
SHRED TEX	15150 SOMMERMEYER	HOUSTON	TX	77041	First-Class Mail
UNLIMITED CONTROL & SUPPLY INC.	SUITE 190 EL ELLISH, PRESIDENT	HOUMA	LA	70360	First-Class Mail
CAJUN WATER WT RENTALS LLC	1043 WEST TUNNEL BLVD ATTN: JEFF ADAM	HARVEY	LA	70058	First-Class Mail
CONNECTOR SPECIALISTS INC	2125 QUEENS BLVD PO BOX 8988	MANDEVILLE	LA	70470	First-Class Mail
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FRANKS SUPERMARKET	DAVID LEBOEUF C/O FRANKS SUPERMARKET #3 13086 HWY 3235	LAROSE	LA	70373	First-Class Mail
GULFLAND OFFICE SUPPLIES INC.	JOHN LANDRY, PRESIDENT 801 GRASHEAR AVE	MORGAN CITY	LA	70380	First-Class Mail
TOM'S SERVICE STATION	THOMAS J PITRE III PO BOX 184	GOLDEN MEADOW	LA	70357	First-Class Mail
SEATRAN MARINE LLC	RYAN LANDRY, DIRECTOR OF FINANCE 107 HWY 90 WEST	NEW IBERIA	LA	70560	First-Class Mail
GULF SOUTH ARMATURE INC	8550 PARK AVE	HOUMA	LA	70363	First-Class Mail
CALLAIS OFFICE FURNITURE & SUPPLY INC	14402 WEST MAIN STREET ANDRE C BROUSSARD JR, ATTY	CUT OFF HOUMA	LA LA	70345 70364	First-Class Mail First-Class Mail
FENWARE DEVELOPMENT LLC	742 HIGHWAY 182		LA		
WECHEM, INC.	5734 SUSITNA DR	HARAHAN	LA	70123	First-Class Mail
QUALITY PRINTING & EMBROIDERY LLC	PO BOX 69 17919 HWY 3235	GALLIANO	LA	70554	First-Class Mail
MCDONALD WELL SERVICES	MICHAEL GRADY, SECY/TREAS PO BOX 501	SCHRIEVER	LA	70395	First-Class Mail
COLT, INC.	PO BOX 1408	SCOTT	LA	70583	First-Class Mail
BALDWIN HASPEL BURKE & MAYER LLC	LANCE J ARNOLD, AGENT 1100 POYDRAS ST STE 3600	NEW ORLEANS	LA	70163	First-Class Mail
ZEP SALES & SERVICE	3330 CUMBERLAND BLVD SUITE 700	ATLANTA	GA	30339	First-Class Mail
QUALITY RENTAL TOOLS, INC.	PO BOX 2218	HOUMA	LA	70361	First-Class Mail
TOTAL SAFETY US INC	11111 WILCREST GREEN DR # 300	HOUSTON	TX	77042	First-Class Mail
G&M RENTALS LLC	MARK R PHARR III 328 SETTLERS TRACE BLVD	LAFAYETTE	LA	70508	First-Class Mail
G-TECH SERVICES INC	THOMAS J VITALE 40 PEARL STREET NW	GRAND RAPIDS	MI	49503	First-Class Mail
	SUITE 400				
MCMASTER-CARR SUPPLY COMPANY	1901 RIVERSIDE PARKWAY L-JEF-359	DOUGLASVILLE NEW ORLEANS	GA LA	30135 70121	First-Class Mail First-Class Mail
ENTERGY LOUISIANA LLC	4809 JEFFERSON HWY STE A				
BOWLS SLIPS & GRIPS LLC	EMILE JOSEPH JR ESQ ALLEN & GOOCH 2000 KALISTE SALOOM RD, STE 400	LAFAYETTE	LA	70508	First-Class Mail
PETRO PULL LLC	EMILE JOSEPH JR, ATTORNEY ALLEN & GOOCH 2000 KALISTE SALOOM RD, STE 400	LAFAYETTE	LA	70508	First-Class Mail
H2O LLC	JESS FIKE, PRESIDENT 841 VINCENT ROAD	LAFAYETTE	LA	70508-7600	First-Class Mail
FIRE & SAFETY SPECIALISTS	841 VINCENT ROAD  CHRIS ODINET  7701 JOHNSTON ST	MAURICE	LA	70555	First-Class Mail
DOLPHIN ENERGY EQUIPMENT LLC	HOOVER OFFSHORE	NEW IBERIA	LA	70560	First-Class Mail
TECH OIL PRODUCTS INC	4308 W ADMIRAL DOYLE DRIVE 4308 W ADMIRAL DOYLE DRIVE	NEW IBERIA	LA	70560	First-Class Mail
SOUTH LAFOURCHE AIR CONDITION SERVICES INC	DIANE ST PIERRE	CUTT OFF	LA	70345	First-Class Mail
DNOW LP	16028 WEST MAIN STREET KRISTY WOOLSEY 7402 N ELDRIDGE PKWY	HOUSTON	TX	77041	First-Class Mail
GRAY OFFSHORE LLC	JOHN S. GRAY	HOUMA	LA	70361-4198	First-Class Mail
INDUSTRIAL WELDING SUPPLY OF HOUMA LTD	PO BOX 4198 LISA GINTZ	BATON ROUGE	LA	70809	First-Class Mail
	4709 BLUEBONNET BLVD PATRICE WILLIAMS	FRANKLIN	LA	70538	First-Class Mail
DUGAS OIL CO INC	PO BOX 265				
GLOBAL ELECTRIC & SAFETY LLC	20 DAVID SWAN LANE DENISE SHERRILL, TREASURER	PURVIS HOUMA	MS LA	39475 70363	First-Class Mail First-Class Mail
SEA SAFETY & SURVIVAL	128 THOMPSON ROAD	TIOOWA	L^	70303	I list-Class Wall
DUFRENE BUILDING MATERIALS INC	14502 WEST MAIN ST	CUT OFF BATON ROUGE	LA	70345	First-Class Mail
IWS GAS & SUPPLY OF TEXAS LTD	LISA GINTZ 4709 BLUEBONNET BLVD	BATON ROUGE	LA	70809	First-Class Mail
BIG BOY CO LLC DBA DAYS INN GALLIANO	PO BOX 967	GALLIANO	LA	70354	First-Class Mail
TECHNICAL RESOURCE SERVICES	NEIL COLLINS 1000 NORTH CRUSE AVENUE	BROUSSARD	LA	70518	First-Class Mail
LAD SERVICES OF LOUISIANA LLC	1043 E STEPHENSVILLE RD	MORGAN CITY	LA	70380	First-Class Mail
NAUTISK FORLAG USA INC	3321 DIVISION STREET RICKY COMARDELLE	METAIRIE RACELAND	LA LA	70002 70394	First-Class Mail First-Class Mail
OILFIELD LOGISTICS SERVICES, L L C	PO BOX 430				
SOUTHERN HOME FURNISHING	14814 WEST MAIN ST 401 WHITNEY AVE.	CUT OFF GRETNA	LA LA	70345 70056	First-Class Mail First-Class Mail
TECHNICAL ENGINEERING CONSULTANTS, LLC	SUITE 600 ATTN JAMES MYKRIS				
GALLIANO SAFETY SERVICE, LLC	161 W 56TH STREET	CUT OFF	LA	70345	First-Class Mail
VENYU SOLUTIONS LLC	JANET BRITTON, GENERAL COUNSEL 913 S BURNSIDE AVE	GONZALES	LA	70737	First-Class Mail
E & E MACHINE SHOP & SERVICES, LLC	ELLEN CAVALIER 107 PICOU INUSTRIAL COURT	HOUMA	LA	70363	First-Class Mail
STANSBURY & ASSOCIATES LLC	TO'P FLOOD WISHING COOKY C/O LACEY ROCHESTER BAKER DONELSON BEARMAN CALDWELL & BERKOWITZ 701 SAINT CHARLES AVE	NEW ORLEANS	LA	70130	First-Class Mail
CANIK TRAILER RENTALS, LLC	JOHN CANIK	CAMERON	LA	70631	First-Class Mail
<u> </u>	4459 WEST CREOLE HIGHWAY	1	1	1	1

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Marie   Mari	BAYOU OFFICE MACHINES	13066 WEST MAIN ST		LA		
E STATEMENT NO.   CONTROLLED	SCURLOCK ELECTRIC LLC		HOUMA	LA	70363	First-Class Mail
MATERIAN   C.   MATERIAN   MATE	B & B HARDWARE & RENTAL INC	13222 WEST MAIN ST	LAROSE	LA	70373	First-Class Mail
Control   Cont		MARK BELANGER	BROUSSARD	LA	70518	First-Class Mail
SERENCE RO			KENNER	IΑ	70062	First-Class Mail
STATE   STAT	A-1 SERVICES, INC.	555 COOLIDGE ST	JEFFERSON	LA	70121	First-Class Mail
MASS SEMINANTE   MASS	AIRGAS USA LLC		TULSA	OK	74119	First-Class Mail
COUNTY   C	FRANKS SUPERMARKET	DAVID LEBOEUF C/O FRANKS SUPERMARKET#3	LAROSE	LA	70373	First-Class Mail
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MATTHE MERCANTES    THESE DEFENSION   THE SERVICES HERE   MARTIN REPORT MERCANTES	STARGEL OFFICE SOLUTIONS	4700 BLALOCK	HOUSTON	TX	77041	First-Class Mail
MATIN MECHA LUBRICANTS  THE REPORT OF THE PROPERTY  THE REPORT OF THE PROPERTY	IMPACT SELECTOR INTERNATIONAL	6740 HORIZON ROAD	HEATH	TX	75032	First-Class Mail
MARTIN BURKEY SERVICES LLC    SOUTH COMPANIES			HOUSTON	TX	77056	First-Class Mail
MARTIN LEMPT SERVICES LLC  ACRES COSPORATION  ACRES	MARTIN MEGA LUBRICANTS	THREE RIVERWAY SUITE 400				
MARTER ORGONO NA WALER PLUC   MARCER PLUC	MARTIN ENERGY SERVICES LLC	THREE RIVERWAY	HOUSTON	TX	77056	First-Class Mail
CASE FLAME   CAS	AQUEOS CORPORATION	KILMER CROSBY & WALKER PLLC	HOUSTON	TX	77002	First-Class Mail
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SEMBANK RESEASON_TEND	TEXAS COMPTROLLER OF PUBLIC ACCOUNTS	OFFICE OF THE ATTORNEY GENERAL PO BOX 12548, MC-008	AUSTIN	TX	78711	First-Class Mail
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ALLANDECENBROY SERVICES LLC						
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EALER HERMES NA	ALLIANCE ENERGY SERVICES LLC	PO BOX 999			10010	
HOMAS JYILLES ASSER HAVY	EULER HERMES NA	TAMEKA L. CONNEY, INSOLVENCY SPECIALIST CLAIM 000409797	OWINGS MILLS	MD	21117	First-Class Mail
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CHAN BULLARD   SEALMONT   TX   7704   First-Class Mail	DISA GLOBAL SOLUTIONS INC	10900 CORPORATE CENTRE DR	HOUSTON	TX	77041	First-Class Mail
PO BOX 12948 PO BOX 12949 PO FICE OF THE ATTORNEY GENERAL BANKRUPTO' & COLLECTIONS DIVISION  STALLION OFFSHORE QUARTERS, INC.  STALLION OFFSHORE QUARTERS, INC.  MILEVINSKY 1717 PARK ROW, SUITE 160 1717 PARK ROW, SUITE 160 1717 PARK ROW, SUITE 160 POREPONTE MERGENCY MANAGEMENT LP  MICHAEL PROBLEM P	TIGER RENTALS LTD DBA TIGER SAFETY	JOHN BULLARD ORGAIN BELL & TUCKER LLP	BEAUMONT	TX	77704	First-Class Mail
STALLION OFFSHORE QUARTERS, INC.  KIM LEWINSKI 1771 PARK ROW, SUITE 160  MIKE HOLLANDER HOUSTON HOUSTON LA 7043 First-Class Mail First-Class M	TEXAS WORKFORCE COMMISSION	PO BOX 12548 OFFICE OF THE ATTORNEY GENERAL BANKRUPTCY & COLLECTIONS DIVISION	AUSTIN	TX	78711-2548	First-Class Mail
MIKE HOLLANDER HOLLANDER LAW, LLC 70325 HIGHWAY 1077, STE 300 VACCO INC 3JACKIE DOVE BROUGSARD, VICE PRES HOUMA JACKIE DOVE BROUGSARD, VICE PRES HOUMA LA 7034 First-Class Mail	STALLION OFFSHORE QUARTERS, INC.	KIM LEWINSKI	HOUSTON	TX	77084	First-Class Mail
VACCO INC   JACKIE DOVE BROUSSARD, VICE PRES   HOUMA   LA   70364   First-Class Mail	FOREFRONT EMERGENCY MANAGEMENT LP	MIKE HOLLANDER HOLLANDER LAW, LLC	LOVINGTON	LA	70433	First-Class Mail
BRYCE ANTIN, GENERAL COUNSEL   CUT OFF   LA 70345   First-Class Mail	VACCO INC	JACKIE DOVE BROUSSARD, VICE PRES	HOUMA	LA	70364	First-Class Mail
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C/O JOSEPH ROVIRA, COUNSEL TO HOLDER		310 LASER LANE	LAFAYETTE	LA	70507	First-Class Mail
KARL SENNER LLC  STEPHEN M VALDES, CHIEF FINANCIAL OFFICER  KENNER  LA  70062 First-Class Mail  25 W 3RD ST  ACME TRUCK LINE INC  ALAN H GOODMAN  ALL PORT SERVICES LLC  ALAN H GOODMAN  BREAZEALE, SACHSE & WILSON LLP  309 POYDRAS STREET. SUITE 1500  STEPHEN L WILLIAMSON, AGENT & ATTY  FUGRO USA MARINE INC  BAYOU BLACK ELECTRIC SUPPLY  ENCORE WELLHEAD SYSTEMS LLC  SUBMERSIBLE SYSTEMS INC.  BAYOURS STEPHEN LINE  TERRI BUNNSIDE, SEC-TRES  PO BOX 183  MARTIN S BOHMAN, CARLETON LORASO ET AL  MARTIN S BOHMAN, CARLETON LORASO ET AL  BAYON BLACK AGLETON LORASO ET AL  FIRST-Class Mail		C/O JOSEPH ROVIRA, COUNSEL TO HOLDER ANDREWS KURTH KENYON LLP		TX		
ACMETRUCK LINE INC  ALAN H GOODMAN ALL PORT SERVICES LLC  BREAZEALE, SACHSE & WILSON LLP 909 POYDRAS STREET, SUITE 1500  STEPHEN L WILLLIANSON, AGENT & ATTY FUGRO USA MARINE INC  BAYOU BLACK ELECTRIC SUPPLY  ENCORE WELLHEAD SYSTEMS LLC  SUBMERSIBLE SYSTEMS INC.  PO BOX 183  HARVEY LA 70059 First-Class Mail FIRS-Class Mail	KARL SENNER LLC	STEPHEN M VALDES, CHIEF FINANCIAL OFFICER	KENNER	LA	70062	First-Class Mail
ALLPORT SERVICES LLC  ALL AN H GOODMAN BREAZEALE, SACHSE & WILSON LLP 909 POYDRAS STREET, SUITE 1500  FUGRO USA MARINE INC  STEPHEN L WILLIAMSON, AGENT & ATTY FUGRO USA MARINE INC  GORDON ARATA MONTGOMERY BARNETT 201 ST CHARLES AVE. 40TH FLOOR  BAYOU BLACK ELECTRIC SUPPLY  ENCORE WELLHEAD SYSTEMS LLC  SUBMERSIBLE SYSTEMS INC.  SUBMERSIBLE SYSTEMS INC.  ALA 7012  FIRSt-Class Mail		PO BOX 183		LA	70059	First-Class Mail
STEPHEN L WILLIAMSON, AGENT & ATTY GORDON ARATA MONTGOMERY BARNETT 201 ST CHARLES AVE, 40TH FLOOR BAYOU BLACK ELECTRIC SUPPLY CHRISTOPHER C LAPEYROUSE, SECRETARY / TREASURER BAYOU BLACK ELECTRIC SUPPLY CHRISTOPHER C LAPEYROUSE, SECRETARY / TREASURER BOOK WELLHEAD SYSTEMS LLC JENNIFER DUNCAN, VP FINANCE 2121 KIRBY # 137 SUBMERSIBLE SYSTEMS INC. FIRST-Class Mail TERRI BURNSIDE, SEC-TRES PO BOX 1843 MARTIN S BOHMAN, CARLETON LORASO ET AL BATON ROUGE LA 70802 First-Class Mail		ALAN H GOODMAN BREAZEALE, SACHSE & WILSON LLP			70112	
BAYOU BLACK ELECTRIC SUPPLY  CHRISTOPHER C LAPEYROUSE, SECRETARY / TREASURER 5086 HIGHWAY 311  ENCORE WELLHEAD SYSTEMS LLC  SUBMERSIBLE SYSTEMS INC.  SUBMERSIBLE SYSTEMS INC.  MARTIN S BOHMAN; CARLETON LORASO ET AL  BATON ROUGE LA  70361 FIRSt-Class Mail	FUGRO USA MARINE INC	STEPHEN L WILLIAMSON, AGENT & ATTY GORDON ARATA MONTGOMERY BARNETT	NEW ORLEANS	LA	70170	First-Class Mail
ENCORE WELLHEAD SYSTEMS LLC  JENNIFER DUNCAN, VP FINANCE 2121 KIRBY # 137  SUBMERSIBLE SYSTEMS INC.  SUBMERSIBLE SYSTEMS INC.  PO BOX 1843  MARTIN S BOHMAN; CARLETON LORASO ET AL  BATON ROUGE  LA 70802 First-Class Mail	BAYOU BLACK ELECTRIC SUPPLY	CHRISTOPHER C LAPEYROUSE, SECRETARY / TREASURER	HOUMA	LA	70361	First-Class Mail
SUBMERSIBLE SYSTEMS INC.  TERRI BURNISIDE, SEC-TRES PO BOX 1843 PO BOX 1843 MARTIN S BOHMAN; CARLETON LORASO ET AL BATON ROUGE LA 70802 First-Class Mail	ENCORE WELLHEAD SYSTEMS LLC	JENNIFER DUNCAN, VP FINANCE	HOUSTON	TX	77019	First-Class Mail
OFFICIORE TECHNICAL COLUTIONS LC BATON ROUGE LA 70802 First-Class Mail	SUBMERSIBLE SYSTEMS INC.	TERRI BURNSIDE, SEC-TRES	PATTERSON	LA	70392	First-Class Mail
	OFFSHORE TECHNICAL SOLUTIONS LLC		BATON ROUGE	LA	70802	First-Class Mail

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1210 DAVID DR	MORGAN CITY	LA	70380	First-Class Mail
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PO BOX 66658	BATON ROUGE	LA	70896-6658	First-Class Mail
2021 MCKINNEY AVE STE 200	DALLAS	TX	75201-3369	First-Class Mail
	DBA MCDONOUGH MARINE SVC LUGENBUHL WHEATON PECK ET AL 801 POYDRAS ST, STE 2775 RONALD MONSOUR 251 HWY 21 STE 200 FREDORIA CARTWRIGHT 10900 CORPORATE CENTRE DR STE #250 ROBERT P CUCCIA APLC 311 GOODE ST KAREN A CAVAGNARO LEAD PARALEGAL C/O ATAT SERVICES INC ONE ATS TWAY ROOM 34104 ROBERT P CUCCIA APLC 311 GOODE ST KEVIN KEELING - KEELING LAW LLC 3310 KAYT PWY SUITE 100 DAVID S ELDER GARDERE WYNNE SEWELL LLP 1000 LOUISIANA, SUITE 2000 ATTHE BENJAMIN W KADDEN 601 POYDRAS ST SUITE 2775 C/O ROBIN B CHEATHAM A DAMS AND RESE LLP 701 POYDRAS STREET, SUITE 4500 245 W 57TH ST WILLIAM MAXWELL, SENIOR COUNSEL 3A LLEN CENTER, 333 CLAY STREET SUITE 4620 ATTHE DIONNE AUSTIN 16201 EAST MAIN STREET EMILE 305EPH JR ESQ ALLEN & GOOCH 2000 KALISTE SALOOM RD, STE 400 CHRISTOPHER RIVIERE, ATTORNEY LAW OFFICE OF CHRISTOPHER H RIVIERE, APLC 103 WEST 3RD ST STEPHEN L WILLIAMSON, AGENT & ATTY GORDON ARATA MONTGOMERY BARNETT 201 ST CHARLES AVE 40TH FLOOR CACROCHET JR, SECRETARY 801 POYDRAS ST, SUITE 2775 ATTN: STEWART PECK LUGENBUHL WHEATON PECK ET AL 801 POYDRAS ST, SUITE 2775 ATTN: STEWART PECK LUGENBUHL WHEATON PECK ET AL 801 POYDRAS ST, SUITE 2775 ATTN: STEWART PECK LUGENBUHL WHEATON PECK ET AL 801 POYDRAS ST, SUITE 2775 ATTN: SETWART PECK LUGENBUHL WHEATON PECK ET AL 801 POYDRAS ST, SUITE 2775 ATTN: SETWART PECK LUGENBUHL WHEATON PECK ET AL 801 POYDRAS ST, SUITE 2775 ATTN: SETWART PECK LUGENBUHL WHEATON PECK ET AL 801 POYDRAS ST, SUITE 2775 ATTN: SETWART PECK LUGENBUHL WHEATON PECK ET AL 801 POYDRAS ST, SUITE 2775 ATTN: SENJAMIN W KADDEN LUGENBUHL WHEATON PECK ET AL 801 POYDRAS ST, SUITE 2775 ATTN: SENJAMIN W KADDEN LUGENBUHL WHEATON PECK ET AL 801 POYDRAS ST, SUITE 2775 ATTN: SENJAMIN W KADDEN LUGENBUHL WHEATON PECK ET AL 801 POYDRAS ST, SUITE 2775 ATTN: SENJAMIN W KADDEN LUGENBUHL WHEATON PECK ET AL 801 POYDRAS ST, SUITE 2775 ATTN: SENJAMIN W KADDEN LUGENBUHL WHEATON PECK ET AL 801 POYDRAS ST, SUITE 2775 ATTN: SENJAMIN W KADDEN LUGENBUHL WHEATON PECK ET AL 801 POYDRAS ST, SUITE 2775 ATTN: SENJAMIN W KADDEN LUGENBUHL WHEATON PECK E	DBA MCDONDUIGH MARINE SVC LUGENDUIL WHEATON PECK ET AL 601 FOYDRAS ST. SEE 2775  201 HWY 21 STEE 200  PREDDRIA CARTWRIGHT 10900 CORPORATE CENTRE DR STEE 2820  ROBERT P CUCCULAPLC NOBERT P	DBA MICCONOLOGH MARINE SVC LUGENBULL WEARTON PECK ET AL SOL PROPRIANS STEE 2795  25 HWY 21 STE 200  PREDORIA CARTWRIGHT 10000 CORPORAL CEMTRE DR  ROBERT P CUCCIA APLC 31 (GOODE ST AMBER A CANAGANAR LEAD PARALEGAL CO ATST SERVICES INC SOLOGH A CARTWRIGHT  AND	DRA MODONOUGH MARINE SVC LUGERBURL, WERTON PECK ET TAL  RONALD MORROUR  281 HMY 21 STE 200  PREDDIAG CARTWRIGHT RONALD MORROUR  281 HMY 21 STE 200  PREDDIAG CARTWRIGHT RONALD MORROUR  391 HOUSTON  ROBERT P CUCCA APLC  WARRANT SERVICES INC  ONE ATS TWAY  ROBERT P CUCCA APLC  WARRANT SERVICES INC  WARRANT SER

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UDDO COUNTY ST. II	TARA L GRUNDEMEIER	HOUSTON	TX	77253-3064	First-Class Mail
HARRIS COUNTY ET AL	PO BOX 3064 LINEBARGER GOGGAN BLAIR & SAMPSON LLP				
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